

1 DAVID L. YOHAI (*pro hac vice*)  
2 ADAM C. HEMLOCK (*pro hac vice*)  
3 DAVID E. YOLKUT (*pro hac vice*)  
4 LARA E. VEBLEN TRAGER (*pro hac vice*)  
5 **WEIL, GOTSHAL & MANGES LLP**  
6 767 Fifth Avenue  
7 New York, New York 10153-0119  
8 Telephone: (212) 310-8000  
9 Facsimile: (212) 310-8007  
10 E-mail: adam.hemlock@weil.com

11 BAMBO OBARO (267683)  
12 **WEIL, GOTSHAL & MANGES LLP**  
13 201 Redwood Shores Parkway  
14 Redwood Shores, California 94065-1175  
15 Telephone: (650) 802-3000  
16 Facsimile: (650) 802-3100  
17 E-mail: bambo.obaro@weil.com

18 JEFFREY L. KESSLER (*pro hac vice*)  
19 EVA W. COLE (*pro hac vice*)  
20 MOLLY M. DONOVAN (*pro hac vice*)  
21 **WINSTON & STRAWN LLP**  
22 200 Park Avenue  
23 New York, New York 10166-4193  
24 Telephone: (212) 294-6700  
25 Facsimile: (212) 294-7400  
26 E-mail: jkessler@winston.com

27 *Attorneys for Defendants Panasonic Corporation, Panasonic Corporation of North America, and*  
28 *MT Picture Display Co., Ltd.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

No.: 3:07-cv-05944 SC  
MDL No. 1917  
Judge: Hon. Samuel Conti

This Document Relates to:

ALL ACTIONS

**DECLARATION OF SHINICHI MIYOSHI  
RE MT PICTURE DISPLAY CO., LTD. IN  
SUPPORT OF CERTAIN DEFENDANTS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT WITH RESPECT TO DAPS'  
ALLEGED DIRECT DAMAGE CLAIMS  
BASED ON PURCHASES FROM SANYO**

I, Shinichi Miyoshi, declare under penalty of perjury that:

1. I am employed by Defendant Panasonic Corporation f/k/a Matsushita Electric Industrial Co. Ltd. (hereinafter, "Panasonic Corp.") in the Legal Affairs Center, AVC Networks Company, Panasonic Corporation. I am a resident of Japan. I am an adult over eighteen (18) years of age, and the statements in this Declaration are made on my own personal knowledge of the records available to me and my general knowledge of the business practices of Panasonic Corp. and MT Picture Display Co., Ltd., f/k/a/ Matsushita Toshiba Picture Display Co., Ltd. ("MTPD").

2. Panasonic Corp. is a Japanese company with its principal place of business located at 1006 Oaza Kadoma, Kadoma-shi, Osaka 571-8501, Japan.

3. MTPD is a Japanese entity with an office in Osaka, Japan at 1-15 Matsuo-Cho, Kadoma-shi, Osaka, 571-8504, Japan. MTPD was established as a joint venture between Panasonic Corp. and Toshiba Corporation ("Toshiba") in 2003. Panasonic Corp. held 64.5% of MTPD at the time that MTPD was formed. Panasonic Corp. acquired Toshiba's 35.5% interest in MTPD on March 30, 2007, at which time MTPD became a wholly-owned subsidiary of Panasonic Corp.

4. During the period March 1, 1995 through November 25, 2007 (the "Relevant Period"), and from the start of the Relevant Period until December 21, 2009, MTPD did not hold an ownership interest in Sanyo North America Corporation, Sanyo Manufacturing Corporation, Sanyo Energy USA Corporation, Sanyo Fisher (USA) Corporation, or Sanyo Electric Co., Ltd. (individually, each a "Sanyo Entity" and collectively the "Sanyo Entities").

5. From the start of the Relevant Period until December 21, 2009, no officer or director of MTPD served as an officer or director of any Sanyo Entity.

6. From the start of the Relevant Period until December 21, 2009, MTPD was not a party to any loan or trust agreement with any Sanyo Entity.

7. From the start of the Relevant Period until December 21, 2009, MTPD did not exercise any control over any practice or policy of any Sanyo Entity, including with respect to pricing of CRT finished products or otherwise.

1  
2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct.

4  
5 Executed at Osaka, Japan on November 6, 2014.

6  
7 By: Shinichi Miyoshi  
8 Shinichi Miyoshi